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8 IN THE UNITED STATES DISTRICT COURT
9 EASTERN DISTRICT OF CALIFORNIA
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11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 APPROXIMATELY \$1,167,233.00 IN
U.S. CURRENCY,

15 Defendant.
16

CASE NO. 1:23-MC-00041-JLT

STIPULATION AND ORDER EXTENDING TIME
FOR FILING A COMPLAINT FOR FORFEITURE
AND/OR TO OBTAIN AN INDICTMENT
ALLEGING FORFEITURE

17 It is hereby stipulated by and between the United States of America, potential claimant Sharon
18 Mann (“Mann” or “claimant”), by and through their respective counsel, and potential claimant, Jairi Carter
19 (“Carter” or “claimant”), appearing *in propria persona*, as follows:

20 1. On or about February 7, 2023, claimant Sharon Mann filed a claim in the administrative
21 forfeiture proceedings with the U.S. Customs and Border Protection with respect to the Approximately
22 \$1,167,233.00 in U.S. Currency (hereafter “defendant currency”), which was seized on December 13, 2022.

23 2. On or about March 15, 2023, claimant Jairi Carter filed a claim in the administrative
24 forfeiture proceedings with the U.S. Customs and Border Protection with respect to the Approximately
25 \$1,167,233.00 in U.S. Currency (hereafter “defendant currency”), which was seized on December 13, 2022.

26 3. The U.S. Customs and Border Protection has sent the written notice of intent to forfeit
27 required by 18 U.S.C. § 983(a)(1)(A) to all known interested parties. The time has expired for any person
28 to file a claim to the defendant currency under 18 U.S.C. § 983(a)(2)(A)-(E), and no person other than the

claimants have filed a claim to the defendant currency as required by law in the administrative forfeiture proceeding.

4. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to forfeiture within ninety days after a claim has been filed in the administrative forfeiture proceedings, unless the court extends the deadline for good cause shown or by agreement of the parties. That deadline is May 8, 2023.

5. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to further extend to July 7, 2023, the time in which the United States is required to file a civil complaint for forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to forfeiture.

6. Accordingly, the parties agree that the deadline by which the United States shall be required to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to forfeiture shall be extended to July 7, 2023.

Dated: May 5, 2023

PHILLIP A. TALBERT
United States Attorney

/s/ Alyson A. Berg
ALYSON A. BERG
Assistant U.S. Attorney

Dated: May 5, 2023

/s/ Kirk T. Kennedy
KIRK T. KENNEDY
Attorney for potential claimant
Sharon Mann
(Original signature retained by attorney)

Dated: May 5, 2023

/s/ Jairi Carter
JAIRI CARTER
Potential Claimant
Appearing *in propria persona*
(Original signature retained by attorney)

IT IS SO ORDERED.

Dated: May 8, 2023

Jennifer L. Thurston
UNITED STATES DISTRICT JUDGE

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